



Air Quality Permitting Response to Public Comments

December 13, 2018

Permit to Construct No. P-2012.0056

Project No. 61104

**ON Semiconductor
Pocatello, Idaho**

Facility ID No. 005-00017

Prepared by:
Dan Pitman, P.E., Permit Writer
AIR QUALITY DIVISION

Final

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BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit to construct for the proposed facility emissions cap (FEC) permit to construct for ON Semiconductor from October 31, 2018 through November 30, 2018, in accordance with IDAPA 58.01.01.209.01.c. During this period, a comment was submitted in response to DEQ's proposed action. The comment and DEQ's response is provided in the following section. All comments submitted in response to DEQ's proposed action are included in the appendix of this document.

PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the proposed permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the proposed permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at: <http://adminrules.idaho.gov/rules/current/58/0101.pdf>.

Comment 1: ON Semiconductor commented that they will need at least 8 hours per day of operation for the diesel fired emergency engines to accommodate once per year load testing of the engines as opposed to the 1 hour per day limit that the draft permit has. Load testing of each individual engine will occur under the following 4 hour schedule:

- 1 hour at 20% load,
- 1 hour at 40% load,
- 1 hour at 60% load, and then
- 1 hour at 80% load.

Two engines will be tested one day and the other the next day.

The annual load bank test for each of our three diesel fired emergency generators only takes place once per year, sometime during August through October. We normally do two generators during one day (8am to 5pm), 4 hours per generator. The third generator will be tested the following day, which also takes 4 hours.

Response 1: DEQ previously modeled each of the 3 diesel engines operating 1 hour per day based on the emission inventory provided by ON Semiconductor. Accordingly, in the draft permit for public comment each engine was limited to 1 hour per day of operation for a total of 3 hours per day of operation.

Based on ON Semiconductor's comments submitted during the public comment period they will need a total of at least 8 hours of operation per day for 2 engines. The testing schedule they provided is for testing 2 engines for 4 hours each for a total of 8 hours per day of operation.

DEQ has re-run the air pollution dispersion model and determined that operating each of the 3 engines 4.5 hours per day is acceptable because it will not cause or significantly contribute to a violation of the National Ambient Air Quality Standards. The permit has been amended to allow up to 4.5 hours per engine per day of operation for a total of 13.5 hours per day of operation. This is greater than the 4 hour load testing schedule per engine provided by ON Semiconductor during the comment period. The permit also requires monitoring the hours of operation of the engines each day.

Appendix
Public Comments Submitted for
Permit to Construct
P-2012.0056

From: Teri Bowman <Teri.Bowman@consem.com>
To: Daniel Pitman
Cc:
Subject: FW: FEC Draft Air permit

I believe our draft permit is still out for public comment. I found something that we missed during commenting on our air permit. For Emergency Generators, under hours of operation for maintenance.

- The operation of each emergency stationary CI engine shall not exceed a maximum of one hour in any 24-hour period for routine testing and maintenance activities.

During annual load bank testing each emergency generator is ran for approximately 5 hours. We will need to get this changed prior to IDEQ issuing our final permit. We did put in our permit application:

Weekly emergency engine testing is done under no load. However, the emergency diesel generators will need to undergo annual testing (once per year) according to the following testing schedule:

- 1 hour at 20% load,
- 1 hour at 40% load,
- 1 hour at 60% load, and then
- 1 hour at 80% load.

Annual testing of each emergency diesel generator will be done individually and will not overlap with the testing of another emergency diesel generator. Load testing is required on the diesel generators to ensure that they continue to operate properly.

I would just clarify with the State that they do not considered this "routine" testing and maintenance, i.e. weekly. If not, then request that they add an exception for the annual testing.

Thank you,
Regards,
Teri



Teri L. Bowman | ON Semiconductor

FHS Engineer
2300 Buckskin Road | Pocatello, Idaho 83201

From: Teri Bowman <Teri.Bowman@consem.com>
To: Daniel Pitman
Cc:
Subject: RE: HPE CM: FW: FEC Draft Air permit

Sent: Tue 11/27/2018 1:44

The annual load bank test for each of our three diesel fired emergency generators only takes place once per year, sometime during August through October. We normally do two generators during one day (8am to 5pm), 4 hours per generator. The third generator will be tested the following day, which also takes 4 hours.

It is my understanding for testing and maintenance there are some exceptions, but if not then I guess we will need a daily limit of at least 8 hours during our annual testing.

Thank you,

From: Teri Bowman <Teri.Bowman@consem.com>
To: Daniel Pitman
Cc: Dennis Mahri Pao Baylon
Subject: RE: HPE CM: FW: FEC Draft Air permit

Sent: Wed 11/28/2018 9:08 AM

Sounds good. Thank you for the update.

From: Daniel Pitman@Des.Ideq.gov [mailto:Daniel.Pitman@Des.Ideq.gov]
Sent: Wednesday, November 28, 2018 8:01 AM
To: Teri Bowman <Teri.Bowman@consem.com>
Cc: Dennis Mahri Pao Baylon
Subject: RE: HPE CM: FW: FEC Draft Air permit

[External Email]: This email arrived from an external source - Please exercise caution when opening any attachments or clicking on links.

Hi Teri,

We are giving you our "exception" for emergency engines, which is to not model for the 1-hr NO2 standard. We model for all other pollutants and averaging times.

Currently the permit has a 1-hr per day limitation on the planned operation of the generator sets. With your new request we have to rerun the model with 8 hours of emissions per day. I believe the pollutant of concern is the 24-hr PM10/PM2.5 standards. The result will most likely be that you will have an 8 hour per day limit and then you will be required to monitor hours of operation each day you operate an engine (including no load testing).

Dan
208-373-0500

From: Teri Bowman [mailto:Teri.Bowman@consem.com]
Sent: Tuesday, November 27, 2018 1:44 PM
To: Daniel Pitman
Subject: RE: HPE CM: FW: FEC Draft Air permit

The annual load bank test for each of our three diesel fired emergency generators only takes place once per year, sometime during August through October. We normally do two generators during one day (8am to 5pm), 4 hours per generator. The third generator will be tested the following day, which also takes 4 hours.

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Thank you,